

EXHIBIT F

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,)
Plaintiff,)
vs.) Case No.
UBER TECHNOLOGIES, INC.;) 3:17-cv-000939-WHA
OTTOMOTTO LLC; OTTO TRUCKING,)
INC.,)
Defendants.)
_____)

VIDEOTAPED DEPOSITION OF COLIN SEBERN

San Francisco, California

Tuesday, August 22, 2017

Volume I

Reported by:

CARLA SOARES

CSR No. 5908

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1 maybe just there on his own, like, not actually
2 working there, and then -- or a consultant or
3 something like that. But I know he wasn't an
4 employee.

5 Q But he eventually did --

6 A Yes.

7 Q During your interactions with Anthony at
8 Otto, did you ever see him using a personal laptop?

9 A No.

10 Q Did you ever see him using any laptop?

11 A Yes.

12 Q And it was an Otto-issued laptop?

13 A I bought it for him.

14 Q And as far as you know, that's the only
15 laptop that he ever used for work?

16 A It's the only one I've ever seen.

17 Q After you bought it for him, did you ever
18 have any involvement with any of the software or
19 anything that was installed on it?

20 A I think I helped him install Windows on it
21 at one point. It was a Mac. So you can do both at
22 the same time. I think I helped him with that at
23 one point. I helped a lot of people with it.
24 Nothing unique.

25 Q After Uber acquired Otto, do you have any

1 knowledge about how the laptops -- the Otto laptops
2 were integrated into Uber systems?

3 A Yeah. Every -- all of the laptops that
4 were at Otto were purchased by me. And after we
5 became -- after Uber acquired us, their IT team took
6 over and did their software rollout, I guess you
7 would call it, where the machines become what they
8 call managed machines.

9 Q And that happened to every Otto laptop?

10 A Yes.

11 Q You don't know of any instance where there
12 was an Otto laptop that didn't become an
13 Uber-managed machine?

14 A Correct.

15 Q And you think that every Otto laptop was
16 one that you had purchased?

17 A Yeah, between -- myself, and then
18 eventually I had some help. But I bought all the
19 stuff from the Apple store in Palo Alto and
20 San Francisco.

21 Q You never heard of an instance where an
22 Otto laptop didn't get wrapped into the Uber
23 software rollout because it was purchased with a
24 different credit card?

25 A I don't.

1 Q And do you know for sure that Anthony's
2 Otto-issued laptop became an Uber-managed device?

3 MS. HARTNETT: Objection.

4 THE WITNESS: Yeah, I think it did,
5 because I remember him showing me stuff like one of
6 the apps from Uber, and I don't think you can access
7 it without that management software installed.

8 BY MR. McCAULEY:

9 Q Do you know if he had a second laptop
10 issued to him by Uber?

11 A No.

12 Q You don't know?

13 A I do not know.

14 Q So you don't know whether or not that
15 could have been from an Uber-issued laptop that he
16 was showing you the app?

17 A No, it was the one I bought him.

18 Q How do you know that?

19 A Because it was -- it was unique. It was
20 one of the ones that just came out, the new -- I
21 think they called it a MacBook, not a MacBook Air
22 not a MacBook Pro. I bought two of them, and he got
23 one of them. Like, it's a unique color.

24 Q And you think that that was the laptop
25 that he was using when he was showing you the app

1 I, the undersigned, a Certified Shorthand
2 Reporter of the State of California, do hereby
3 certify:

4 That the foregoing proceedings were taken
5 before me at the time and place herein set forth;
6 that any witnesses in the foregoing proceedings,
7 prior to testifying, were administered an oath; that
8 a record of the proceedings was made by me using
9 machine shorthand which was thereafter transcribed
10 under my direction; that the foregoing transcript is
11 a true record of the testimony given.

12 Further, that if the foregoing pertains to
13 the original transcript of a deposition in a Federal
14 Case, before completion of the proceedings, review
15 of the transcript [] was [X] was not requested.

16 I further certify I am neither financially
17 interested in the action nor a relative or employee
18 of any attorney or any party to this action.

19 IN WITNESS WHEREOF, I have this date
20 subscribed my name.

21 Dated: 8/23/2017

22
23 Carla Soares

24 CARLA SOARES

25 CSR No. 5908